

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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ALAN BROWN,	:	Case No. 05 Civ. 11178 (NG)
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	
STATE STREET CORPORATION	:	
and STATE STREET GLOBAL	:	
ADVISORS,	:	
	:	
Defendants.	:	
-----	x	

**LOCAL RULE 16.1 JOINT SCHEDULING  
CONFERENCE REPORT**

1. Preliminary Statement

The parties certify that they have conferred prior to the scheduling conference concerning the agenda for the scheduling conference, a proposed pretrial schedule and discovery plan and consideration of trial before a magistrate, in accordance with LR 16.1(b).

The parties certify that all initial disclosures will be made within thirty days of the date of the conference.

The parties certify that plaintiff will tender a settlement proposal to defendant prior to the conference and that defendant will be prepared to respond fully at the conference.

2. Agenda of Matters to be Discussed

The parties suggest that the following matters should be addressed at the Scheduling Conference:

Schedule for discovery and dispositive motions.

3. Joint Pretrial Discovery and Motion Schedule

The parties' scheduling proposals are as follows:

**Plaintiff's proposed schedule**

<b>Event</b>	<b>Date</b>
All written discovery requests served	February 15, 2006
All depositions completed	May 31, 2006
All dispositive motions filed, with responses 30 days after service	June 30, 2006

**Defendants' proposed schedule**

**DISCOVERY**

<b>Event</b>	<b>Date</b>
Deadline for joinder of parties and amendment of pleadings	January 20, 2006
Deadline for completion of fact discovery	June 30, 2006
Deadline for designation of all experts and production of expert reports	July 31, 2006
Deadline for designation of all rebuttal experts and production of expert reports	August 31, 2006
Deadline for completion of all expert discovery	September 14, 2006

**MOTION PRACTICE**

<b>Event</b>	<b>Date</b>
Deadline for filing of dispositive motions	October 13, 2006
Deadline for filing of responses to dispositive motions	Thirty (30) days after service of moving papers
Deadline for filing of replies to dispositive motions	Fourteen (14) days after service of response papers

4. Limitations on Discovery

The parties currently do not anticipate the need to exceed the number of discovery events stated in LR 26.1(c).

ALAN BROWN,

STATE STREET CORPORATION  
and STATE STREET GLOBAL ADVISORS,

By his Attorney,

By their Attorneys,

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Dated: December 5, 2005